

April 25, 2014

Ms. Jennifer deNicola, President
Malibu Unites
22747 Pacific Coast Highway, Suite 401
Malibu, California 90265

Dear Ms. deNicola:

Thank you for your March 10, 2014 email asking that I address several concerns regarding EPA's strategy to address PCBs at the Malibu High School/Middle School.

I want to provide some background on EPA's approach to PCBs in schools and how this is implemented at Malibu High School/Middle School. PCBs were widely used in caulking materials, as well as in paints and other building materials, in structures constructed from the 1950s until the late 1970s. It is common to find PCBs in buildings such as schools constructed or renovated during this time frame. Given the widespread use of PCBs and the variation of PCB concentrations in building materials, EPA's general strategy to address PCBs in building materials is one of avoiding harmful human exposures.

EPA has developed and posted a number of fact sheets to help school administrators and building owners address the impacts associated with potential exposures from PCBs in building materials. The fact sheets recommend risk-management strategies to reduce unacceptable exposures from primary PCB sources (i.e., products manufactured with PCBs like caulk and light ballasts) and secondary PCB sources (i.e., materials that may become contaminated by primary sources).

The EPA fact sheet, "Preventing Exposure to PCBs in Caulking Material" (available at <http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/pdf/caulkexposure.pdf>) provides a good summary of key recommendations such as:

- Steps that concerned school administrators can take to minimize the potential for PCBs in the indoor air;
- Cleaning and proper maintenance of ventilation systems; thorough and frequent cleaning of surface areas to minimize exposures; and
- "If school administrators and building owners are concerned about exposures to PCBs and wish to supplement these steps, EPA recommends testing to determine if PCB levels in air exceed EPA's suggested public health levels. If testing reveals PCB levels above these levels, schools should attempt to identify any potential sources of PCBs that may be present in the building, including testing samples of caulk and other building materials."

Generally, when testing of caulk or other building materials in structures show PCBs are present at or above 50 ppm, the PCB regulations in 40 CFR 761 implementing the Toxics Substances Control Act (TSCA) require that the PCB-containing material be removed.

When spills or releases of liquid PCBs at or above 50 ppm contaminate non-porous surfaces (e.g., metal), those surfaces must be cleaned to the regulatory standard of less than or equal to 10 ug/100 cm² PCBs. Porous surfaces (e.g., concrete, brick) and non-porous surfaces can also become contaminated by PCBs contained in dust. For these situations, a site specific, protective risk-based PCB standard for surfaces will be developed as part of the cleanup plan.

In the case of Malibu High School/Middle School, EPA was notified in November 2013 that the District had collected surface wipe, caulk, and air samples and had these samples analyzed for PCBs. All of the air samples had PCB levels within EPA's acceptable risk range for a residential exposure scenario and below the applicable EPA "Public Health Levels for PCBs in Indoor School Air" ("<http://www.epa.gov/pcbsincaulk/pdf/maxconcentrations.pdf>"). However, four surface wipe samples showed PCB levels above 10 ug/100 cm²; and four caulk samples showed PCB concentrations above 50 ppm. Because the caulk and wipe samples were above the TSCA regulatory levels, I notified the District that they would need to submit a cleanup plan to EPA and recommended that they implement PCB Best Management Practices to control dust.

During the school's winter break, the District conducted cleaning of the five rooms with the elevated PCBs in caulk and/or wipe samples, as well as, conducted post-cleaning air and wipe sampling. Comparison of the pre- and post-cleaning air and wipe samples show that all post-cleaning samples were below our guidelines and show a reduction in PCB air concentrations of approximately 50 percent and a reduction of PCBs on surfaces of approximately 90 percent. We are aware that certain additional rooms cleaned and sampled independently by the District, without EPA oversight, show lower reductions in air concentrations.

On April 25, 2014, we expect to receive a cleanup plan from the District that will include, at a minimum, a plan to remove all caulk currently tested that contains PCBs above 50 ppm, remove any deteriorated caulk from the school, and sample air inside all pre-1979 structures. In addition, we recommended that the District consider annual thorough cleaning of the school to maintain air quality. We are not requiring additional caulk testing or removal beyond what the cleanup plan may require unless air sample results are above our suggested public health guidelines.

Enclosed are responses to your questions and concerns. If you have any questions regarding my response, please contact me by phone at 415-972-3352 or email at Armnn.Steve@epa.gov.

Sincerely,

Steve Armann, Manager,
Corrective Action Section, Land Division

Enclosure

cc: Thomas Cota, DTSC